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**HARWOOD FEFFER LLP
488 MADISON AVENUE
NEW YORK, NEW YORK 10022**

TELEPHONE: (212) 935-7400
TELECOPIER: (212) 753-3630

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September 10, 2014

By ECF

The Honorable Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: In re American International Group, Inc. ERISA Litigation II,
Master File No. 08-CV-5722 (LTS) (DCF)

Dear Judge Swain:

We are Interim Co-Lead Counsel for the ERISA Plaintiffs in the referenced action and write on behalf of all parties in connection with the Court's order of June 26, 2014 ("June 26, 2014 Order").

The parties have agreed to schedule a mediation before United States District Court Judge Layn R. Phillips (Ret.) to explore resolution of this action, and are in the process of working with Judge Phillips to secure a date for the mediation as soon as possible. Judge Phillips conducted the prior mediation in this ERISA action, as well as the mediation resulting in the proposed settlement of the companion litigation, *In re American International Group, Inc. 2008 Securities Litigation*, No. 08-cv-4772 (LTS)(DCF), also pending before Your Honor.

In light of the upcoming mediation, we respectfully request that the Court postpone the Pretrial Conference scheduled for September 18, 2014 at 11:00 a.m., as well as the Final Pretrial Conference scheduled for September 26, 2014 at 3:00 p.m., until later dates of Your Honor's choosing, after the parties have had the opportunity to mediate and report back to the Court. We will, of course, promptly apprise Your Honor of the outcome of the pending mediation.

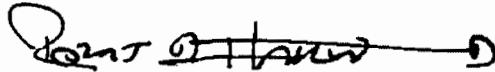
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Lastly, pursuant to the June 26, 2014 Order, Defendants are to answer or otherwise respond to the Consolidated Second Amended Complaint by October 3, 2014. The parties respectfully request that this deadline likewise be postponed until forty-five (45) days after the conclusion of the pending mediation.

Respectfully yours,



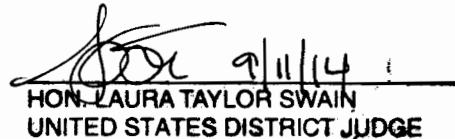
Robert I. Harwood

RIH:ggc

cc: Magistrate Judge Debra Freeman (via ECF)
All Counsel (via ECF)

The foregoing requests
are granted in part.
September 18, 2014,
conference is adjourned
to November 14, 2014,
at 11:45 AM. The
final pretrial conference is
adjourned to ~~as~~ February 13, 2015,
at 10:30 AM. Defendants'
time to respond to the
Consolidated Second Amended
Complaint is extended to
December 12, 2014.

SO ORDERED:



9/11/14
HON. LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE